

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

V.

JOSE LUIS TREJO

§
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§
§
§

Cr. No. 7:20-cr-01676-1

**DEFENDANT’S MOTION TO AMEND TERMS AND CONDITIONS OF RELEASE TO
ALLOW DEFENDANT TO TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, **Jose Luis Trejo**, by and through his undersigned counsel and moves this honorable court to amend the terms and conditions of his release on bail to allow him to travel to New York, NY, and in support thereof would respectfully show:

I.

Defendant is currently set for status conference on February 15, 2022 before this honorable court. [DE 41]. This request for bond modification seeks to add a trip of necessity, as follows:

II.

Defendant requests permission to travel to New York, NY while on pretrial release. Defendant would be traveling to drop off his nineteen year old daughter at

the “Culinary Tech Center” in New York, NY. This will be a trip to facilitate the transition for his teenage daughter as she pursues higher education in the culinary field. Defendant would be traveling from January 25, 2022 to January 31, 2022. Defendant would be staying at the Stewart Hotel located on 371 7th Ave. New York, NY 10001 and its environs.

III.

Defendant represents to the court that he continues to abide by all the requirements of his pretrial release and will be present in person on the date ordered by this honorable court.

IV.

A.U.S.A. Roberto Lopez, Jr., is unopposed.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the honorable court amend his terms and conditions of release to permit him to travel to New York, NY.

Respectfully submitted,

/s/Alejandro Ballesteros

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Certificate of Service

On January 20, 2022 this unopposed motion was filed via ECF and served upon Assistant U.S. Attorney, Roberto Lopez.

/s/Alejandro Ballesteros
Alejandro Ballesteros

Certificate of Conference

On January 19, 2022, Assistant U.S. Attorney for the Southern District of Texas, Mr. Roberto Lopez, was consulted and is not opposed to this motion.

/s/Alejandro Ballesteros
Alejandro Ballesteros